



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

April 3, 1998

RE: Master Metals, Inc. Site -  
Phase I Final Report  
Time Critical Removal Action

Mr. Ababi Harris  
U.S. EPA Region 5  
77 W. Jackson Blvd. SR-6J  
Chicago, IL 60604-3590

Dear Mr. Harris:

The Phase I Final Report for Time Critical Removal Action at the Master Metals Site in Cleveland, Ohio was received by this office on March 11, 1998. The additional documentation provided by ENTACT (Table 3-1 and Figure 6-1) was received April 1, 1998. Ohio EPA has the following comments on the report:

**Section 3.1.1 Discussion of Results** *Comment # 1* (Table 3-1): Please clarify why the MiniRAM Reading data for 10/11/97 (Appendix A) were omitted from Table 3-1.

**Section 5.1 Decontamination Activities (Baghouse facility)** *Comment # 2* (page 11, Table 5-1, Table 5-2): Please explain the implications of the Scarification and Exterior Decontamination Verification results of greater than 5 mg/L for TCLP Lead in the context of the narrative on decontamination activities.

**Section 5.1 Decontamination Activities (Furnace Structure)** *Comment # 3* (page 11): Please clarify the collection mechanisms used to deal with the decontamination water from the high pressure water blasters used in the decontamination of the furnace structure.

**Section 6.3 Laboratory Chemicals** *Comment # 4* (page 17): Ohio EPA would appreciate documentation (in an appendix) on the disposal of the laboratory chemicals, documenting compliance with the applicable regulations.

**Section 7.3.2. Laboratory Verification** *Comment # 5* (page 19, table 7-1, Table 7-2): Please clarify the discrepancy between the narrative and the tables with respect to the choice of the grids for laboratory verification of lead. According to the narrative (three) samples were collected from the eleven grids found to contain native sand or gravel for laboratory verification (Table 7-2). However, one of the grids chosen for laboratory verification, Z-1, is described in Table 7-1 as "black, brown, rust slag" and not native sand or gravel; please clarify why this specific grid was chosen. Please also ensure grid correspondence between Table 7-1 and Figure 7-1.

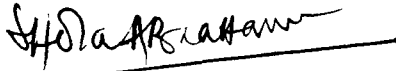


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**Section 8.1.2 Treatability Sample Analysis** *Comment #* (page 21 and Table 8-2): With reference to the comment (paragraph 3) that the treatability test results show that the waste streams were successfully treated to non-hazardous characteristic levels, the data (Table 8-2) appear to indicate that lead was treated to non-hazardous characteristic levels. However, cadmium in certain waste samples (for example, SDY-04) remained above the TCLP levels, and data on cadmium and arsenic were also not provided for several samples (for example, SDY-01, SDY-02, SDY-03, SDY-09-2). Therefore, the narrative needs to be modified to reflect this. Additionally, the post-treatment levels with respect to adding the 10%-5% of treatment blend to SDY-01 and the (final) levels detected in SDY-09 should be provided to demonstrate that the TCLP levels were lowered to below non-hazardous characteristic levels. Minor discrepancies (transposition error, revealed on spot checking) also exist between the levels provided in Table 8-2 and the analytical data sheets provided in Appendix J.

Please let me know if I can clarify any of my comments.

Sincerely,



Sheila Abraham  
Environmental Specialist  
Division of Emergency and Remedial Response

SA:cl

cc: Bob Princic, Ohio EPA, DERR-NEDO